

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JPMORGAN CHASE BANK, N.A.,

Plaintiff,

v.

CHARLIE JAVICE, OLIVIER AMAR,
CHARLIE JAVICE, in her capacity as Trustee
of CHARLIE JAVICE 2021 IRREVOCABLE
TRUST #1, CHARLIE JAVICE, in her capacity as
Trustee of CHARLIE JAVICE 2021
IRREVOCABLE TRUST #2, and CHARLIE
JAVICE in her capacity as Trustee of CHARLIE
JAVICE 2021 IRREVOCABLE TRUST #3,

Defendants.

Case No. 1:22-cv-01621-MN

**DEFENDANT CHARLIE JAVICE’S MOTION TO PARTIALLY LIFT
THE PSLRA DISCOVERY STAY TO PERMIT DOCUMENT DISCOVERY**

Defendant and Counterclaim Plaintiff Charlie Javice hereby moves this Court to partially lift the Private Securities Litigation Reform Act of 1995 (“PSLRA”) discovery stay that became effective upon Defendant Olivier Amar’s motion to dismiss the complaint in this action, filed on March 1, 2023 (D.I. 14).

The grounds for this motion are set forth more fully in Ms. Javice’s Opening Brief in Support of Her Motion to Partially Lift the PSLRA Discovery Stay to Permit Document Discovery, filed contemporaneously herewith.

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Dated: June 1, 2023

/s/ Michael A. Barlow

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